

Abenaki Water Company
Docket N. DW 19-131
Staff Data Requests Set 1 – to ABENAKI

Date Request Received: 02/03/20
Request No. Staff 1-12

Date of Response: 02/18/20
Witness: Donald Vaughan

REQUEST: RE: Abenaki Supplemental Reply to Omni Complaint, Paragraph 7.

Abenaki discusses Omni's 66-unit hotel that Omni is in the process of constructing. Please provide clear and convincing evidence of Omni's hotel expansion, including substantiated evidence for Rosebrook's implication that "the 8-inch water line will be insufficient to satisfy the upcoming Omni's fire flow needs..."

RESPONSE:

Partial Objection:

As noted in Abenaki's objection dated February 13, 2020 to Staff, Staff is requesting Abenaki to provide either "clear evidence" or "conclusive evidence". These standards are not evidenced in the Commission's rules. Further, the Commission's rules state that "the party seeking relief bears the burden of proving the truth of any factual proposition by a preponderance of the evidence." Puc 203.25 and RSA 541-A:30-a, III (d). It would be inconsistent with this rule as well as State equal protection and due process laws to hold the respondent, Abenaki, to a higher standard than the petitioner in this proceeding. For this reason, Abenaki objects to responding to the data requests at a burden higher than "preponderance of the evidence."

Omni's hotel expansion can be viewed by a site visit to observe construction of the hotel addition that is currently underway.

As to the sufficiency of Omni's fire flow needs, Abenaki might also have commented on the question of reliability and dependability of supply. In any event, Abenaki's remarks were focused on the addition of a 66-unit hotel building dependent on the same single 8-inch fire and domestic line now serving the main hotel (6-inch meter) and other structures. Importantly, Omni never advised Abenaki of the plans and construction of the hotel addition, nor has Abenaki had any opportunity to comment on the project.

The adequacy of the fire flow requirements for Omni can only be determined through an extensive flow testing and analysis by the Insurance Service Office (ISO) and underwriters. Obtaining this information is beyond the reach of Abenaki which already is attempting to cope with mounting regulatory expenses related to current dockets.

However, when Abenaki conducted its hydraulic model in 2017 concerning pressure reduction, the model, running at existing use, shows the pressure at the hotel falling to 83 psi. See 2017 Horizon's report at page 5 of 14. https://www.puc.nh.gov/Regulatory/Docketbk/2017/17-165/LETTERS-MEMOS-TARIFFS/17-165_2019-01-08_ABENAKI_ATT2_PRESSURE_PROBLEM_RPT.PDF This pressure is well under the pressure of 124 psi noted at Report page 5 of 14. Also, as noted in the Report, "[w]hen a 1,000 gpm fire flow is supplied to the hotel during peak hour conditions, the total flow is over 1,600

gpm, which has the velocity of over 9 feet per second in an 8-inch pipeline. This high velocity yields significant pressure loss-so much that the initial runs for both alternatives resulted in negative pressures at the hotel.” Report at page 12 of 14.

Whether fire flows are delivered at 190 psi or 100 psi (as per the Step II Increase), Abenaki is confident that it can provide the same pressure from its infrastructure located within the right-of-way at Base Road. Delivery of adequate fire flows to the multiple existing structures served from the single 8” service line within the hotel complex is yet another matter and is questionable in light of the 66 additional units.

It is not Abenaki’s obligation or responsibility to construct looping service lines or additional entry points on Omni property. That is clearly Omni’s responsibility; however, Abenaki is willing to assist Omni in whatever way possible in the Step II plan, or subsequent initiative, to arrive at a plan and solution to optimally satisfy Omni’s fire flow and domestic water requirements.